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Meyer, Dan

From: McFadden, Kelly
Sent: Friday, April 10, 2020 8:53 AM
To: Jacob Odekirk; Viswanathan, Krishna
Cc: Steve Henson; Thomas Mosher; Meyer, Dan
Subject: RE: Kiln 6 Permit Modification Application

Jacob,
Thank you for the update on PotlatchDelltic's permit application for amendments. You will receive a letter today by email that indicates that as of today the information we have is complete.

However, we are not able to ignore the 2019 St. Maries ambient PM2.5 data once it's been certified and the data will be available before a modified minor NSR permit can be issued. As explained on our April 8th call, the CAA requires that all permits include limits that do not cause or contribute to an exceedance of the NAAQS and must consider all available data. The St. Maries PM2.5 ambient data has been verified and is available in AQS now. IDEQ is currently finalizing their state regulatory monitors certification and this will be complete by the last week of April. IDEQ has indicated that they do not expect that the St. Maries data will change and that they've already tagged any exceptional events.

In order to avoid further delays and in preparation of a future request for information from EPA, we encourage Potlatch to submit an air quality impact analysis that employs the verified St. Maries background ambient air quality data. More specifically, background data between September 2016 through August 2019. Jay McAlpine is available to talk through other approvable AQIA options including using WRF-MMIF data and AERMOD.

Thank you for the open communication as we work towards an air permit that is defensible and protective and that meets Potlatch's needs.

Kelly McFadden, Branch Chief
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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Thursday, April 09, 2020 1:51 PM
To: Viswanathan, Krishna <Viswanathan.Krishna@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>
Cc: Steve Henson <Steve.Henson@PotlatchDeltic.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Meyer, Dan <Meyer.Dan@epa.gov>
Subject: Kiln 6 Permit Modification Application

Krishna and Kelly,

Thank you both for providing us with an update on EPA's current position on our requested changes to the Kiln 6 PSD and mNSR permits. Based on our discussions yesterday, EPA indicated there two potential incompleteness items related to the requested permit revisions. As we indicated on the call, the current status of the economy is having significant

effects on mill operations and our need to revise the Kiln 6 permits as quickly and efficiently as possible. To assist in that effort we address both of EPA's potential incompleteness items in our responses below.

1. Kiln-Wide Average Exit Temperature Limit

   The permit application requested the Kiln 6 exiting air temperature limit be revised from a zone-specific limit of 245 F to kiln-wide average exit air temperature limit of 265 F to allow for a margin of compliance safety. In order to expedite EPA's processing of our requested permit revisions, PotlatchDeltic is willing to accept the kiln-wide average exit air temperature limit of 245 F that we discussed yesterday. This should resolve the potential incompleteness item related to the exit temperature increasing from 245 F.

2. PM2.5 Modeling Analysis Should Include 2019 Background Data

   After our discussions yesterday, we reached out to Idaho DEQ to obtain the 2019 PM2.5 monitoring data for St. Maries, Idaho. Idaho DEQ staff indicated they submitted the preliminary 2019 monitoring data to EPA as required (90 days after 4Q 2019), but the 2019 monitoring data have not been fully QA'd or certified yet. The data will likely be certified sometime in May if there are no further delays in reviewing the data as a result of COVID19 (i.e., stay at home orders).

   Using non-certified monitoring data in the modeling analysis should not be required as the 2019 monitoring data can change as a result of DEQ's review and certification process. We request this incompleteness item be removed from EPA's letter as the certified 2019 monitoring data are not yet available. EPA delaying the processing of the permit revisions for at least another 30 days (~30 days until the certified data are available, additional time to prepare a new modeling analysis, and additional time for EPA to review the new modeling analysis) is unreasonable because the modeling analysis we submitted to EPA includes the most recent certified PM2.5 monitoring data. The permit application we submitted to EPA includes a PM2.5 modeling analysis using the latest three-years of certified PM2.5 monitoring data indicating the requested permit revisions will not cause or contribute to a PM2.5 NAAQS violation.

Let me know if you would like to discuss these topics any further.

Jacob Odekirk
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